

August 11, 2014

W. Dale Harvey, senior Engineer
Central Valley
Regional Water Quality Control Board.
1685 E. Street
Fresno, CA 93708

Sent via E-mail to kcarpenter@waterboards.ca.gov

Re: Victor Packing, Inc, Tentative Waste Discharge Requirements

Dear Mr. Harvey:

The following comments are made on behalf of Victor Packing, Inc.

Victor Packing, Inc requests that design, construction and sampling of monitoring wells be omitted from the order. These expensive monitoring tools provide no information to assist Victor in managing discharges. Victor would like to focus on management tools that can assist its management of discharges. These tools include metering and analysis of supply and wastewater, analysis of receiving lands and development and implementation of nutrient and salinity management or control plans. Based on experience, Victor believes that more nitrogen and potassium will be harvested by crops than applied rendering remaining salts de minimis.

Please clarify the following:

1. Finding 10 states in part "... the existing monthly average daily flow limit of 0.06 mgd and set an annual discharge limit of 10 million gallons which is well below the current annual discharge of about 3 million gallons per year." Both of the limits are well above the current flows.
2. Finding 26 states that the Plant and application area are within flood zone X. Please verify that risk of annual flooding is less than 0.02%.
3. Land Application Area specification 3 places an undefined limit on pH so that buffering capacity of the soil is not exceeded. The pH is not an indicator of impact on buffering capacity of the soil. Total acidity of the effluent would be a better measure. In so much as much of the acidity will be due to organic materials that will be decomposed, impact will be less than indicted by total acidity. Decomposition under aerobic conditions resulting carbon dioxide will be emitted to the atmosphere.

4. Soil monitoring requirements call for determination of cation exchange capacity, CEC, during only the first sampling event. Thank you for limiting this analysis to the first event as CEC is a property that changes only over geologic time. The sum of cations, method of estimating CEC, should not be used. Free lime, gypsum or other minerals in soil un-associated with the cation complex will be extracted giving a high estimate of CEC.
5. Sampling of soil is designated to be collected at six inches, 2, 4 and 6 feet below ground levels. These dimensions designate planes which have no volume and are ambiguous as to the volume to be sampled. In the past Dellavalle Laboratory has collected samples from the surface six inches and one foot increments centered at the remaining three depths. Please designate what volumes should be sampled.
6. The MRP requires that engineering or geologic reports be signed by registered engineers or geologists. It is appropriate that reports be prepared and signed by properly qualified persons. It would be appropriate to require that agronomic reports be signed by certified agronomic practitioners.

Do not hesitate to contact me if you have any questions.

Sincerely,



Nat B. Dellavalle, CPAg/SS
Soil Scientist/Agronomist

NBD:mc